

3

Export Certification
Manual

Special Procedures

Mill Certification Programs for Coniferous Sawn Wood

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Introduction

These special procedures provide information about the Memorandums of Understanding (MOUs) USDA-APHIS-PPQ has initiated with numerous lumber grading agencies, which provide the oversight of Mill Certification Programs. The purpose of the MOUs is to facilitate exports of coniferous sawn wood and to address the phytosanitary concerns of the importing country.

Coniferous sawn wood is an important export from the United States that is highly regulated because of various pests, including the pine wood nematode, *Bursaphelenchus xylophilus*. Therefore, the MOUs establish how the wood products will be inspected and treated at the mill and the documentation that the mill will supply to USDA-APHIS-PPQ for phytosanitary export certification of coniferous sawn wood.

Two of the MOUs eliminate the need to issue a Federal plant export certificate for coniferous sawn wood and allow participating lumber mills to issue their own certification for kiln dried coniferous lumber going to Member States of the European Union. The two MOUs are for the following situations:

- ◆ Coniferous sawn wood using heat treatment certification
- ◆ Debarking and grub hole control of coniferous sawn wood

Mill Certification Programs for coniferous sawn wood utilize the MOUs listed below and further detail:

- ◆ [Mill Certification Program for Heat Treatment of Coniferous Sawn Wood Going to Member States of the European Union](#)
- ◆ [Kiln Dried Coniferous Sawn Wood Going to Non European Union Member States](#)
- ◆ [Debarking and Grub Hole Control of Coniferous Sawn Wood](#)
- ◆ [Biannual Audit Checklist for Certification Programs](#)

Mill Certification Program for Heat Treatment of Coniferous Sawn Wood Going to Member States of the European Union

The Mill Certification Program for heat treatment of coniferous sawn wood going to Member States of the European Union is the most widespread of the Mill Certification Programs. This program provides an industry certification system that is officially approved to meet the phytosanitary import requirements of the European Union for coniferous wood from the United States.

See [Figure 3-6-1 on page 3-6-3](#) and [Figure 3-6-2 on page 3-6-4](#) for an example of an MOU for a Mill Certification Program for heat treatment of coniferous sawn wood going to Member States of the European Union.

Export shipments of wood from lumber mills that are **not** participating in a Mill Certification Program may be certified to Member States of the European Union with PPQ Form 577, if the mill meets the criteria specified in the export summary for the European Union.



Advise exporters that shipments may be rejected or destroyed at destination if the wood has **not** been sawn or kiln dried and heat treated, and is **not** accompanied by the proper certificate.

**3.2-34-85-0254-MU
MEMORANDUM OF UNDERSTANDING
BETWEEN THE
[ASSOCIATION]
AND THE
UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE
PLANT PROTECTION AND QUARANTINE (APHIS)**

ARTICLE 1

The Memorandum facilitates the implementation of an officially approved industry certification system to satisfy the legislation of the European Community derived from Plant Health Directive 77/93/EEC, as amended, with respect to heat treatment of coniferous sawn wood destined to the European Union.

ARTICLE 2

Authority exists under the Plant Protection Act of Section 431 (a), Public Law 106-224, for the Secretary of Agriculture to cooperate with the States of political subdivisions thereof, farmers' associations, and similar organizations, and individuals to detect, eradicate, suppress, control, or to prevent or retard the spread of plant pests and plant diseases, including the export certification of domestic plants and plant products.

ARTICLE 3

The cooperating parties agree that:

- a. The overall direction and control of this cooperative program is to be maintained by APHIS. Inspectional personnel shall remain administratively responsible to the Association.
- b. The basic control requirement for coniferous sawn wood under this system is heat treating/kiln drying to the extent that all parts of the wood, including the core, have reached a temperature of at least 133 degrees F (56 degrees C) for 30 minutes.

ARTICLE 4

The Association agrees to/that:

- a. Heat treated/kiln dried coniferous sawn wood shipments shall be inspected by an approved representative of the Association and, subject to the terms of Article 4.c, below, shall be certified as confirming to the certification statement imprinted on the Heat Treatment Certification Using a Kiln Facility Certificate. A sample of this certificate is annexed to this Document.
- b. Shipments of coniferous sawn wood moving into export channels that have been heat treated/kiln dried according to the requirements of this system shall have bundles of coniferous wood in the shipment marked "HT" or "KD" at the preparing mill.
- c. Maintain signed agreements with participating mills, a register of participating mills, a registry of employees/agents to issue the Heat Treatment Certification Using a Kiln Facility Certificate, a register of agency employees who are authorized to authenticate such certificates, and copies of all certificates issued.
- d. Provide mill inspector training to all participating mills. Monthly review of the individual mill certification program shall be made through regular quality control checks by the Association.
- e. Make files and records available for review by APHIS in carrying out its responsibilities outlined in Article 5. Records will be retained for 3 years after the close of the Federal fiscal year.

ARTICLE 5

APHIS agrees to monitor the certification system for conformance by conducting random biannual inspections (minimally) at participating companies and at points of export and by reviews Lumber Grading Agency files and records.

FIGURE 3-6-1: : Example of MOU for Mill Certification Program for Heat Treatment of Coniferous Sawn Wood Going to European Union Member States (front)

ARTICLE 6

This Memorandum is to define in general terms, the basis on which the parties concerned will cooperate and, as such, does not constitute a financial obligation on the part of APHIS. Each signatory party is to use and manage its own funds in carrying out the purpose of this Memorandum.

ARTICLE 7

Pursuant to Section 22, Title 41, United States Code, no member or delegate to Congress shall be admitted to any share or part of this Memorandum or to any benefit to arise there from.

ARTICLE 8

This Memorandum shall become effective upon date of final signature and shall continue in effect for 5 years. It may be amended at any time by mutual agreement between the parties in writing and may be terminated by mutual agreement of the parties or by either party upon 30 days written notice to the other party.

ASSOCIATION

[LUMBER GRADING AGENCY NAME]

[NAME AND TITLE OF AGENCY REPRESENTATIVE]

[Signature] _____ Date _____

UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE
PLANT PROTECTION AND QUARANTINE

[Signature] _____ Date _____
Regional Director

FIGURE 3-6-2: Example of MOU for Mill Certification Program for Heat Treatment of Coniferous Sawn Wood Going to European Union Member States (back)

Lumber Grading Agencies

Official control of Mill Certification Programs is maintained through MOUs established between USDA-APHIS-PPQ and lumber grading agencies. The participating lumber grading agencies formulate, publish, and maintain grading rules, and provide inspection facilities for softwood under the provisions of the American Softwood Lumber Standard.

See [Figure 3-6-3 on page 3-6-6](#) for a list of the lumber grading agencies that are participating in Mill Certification Programs for heat treatment of coniferous sawn wood going to Member States of the European Union.

Special Procedures: Mill Certification Programs for Coniferous Sawn Wood
Mill Certification Program for Heat Treatment of Coniferous Sawn Wood Going to Member States of the European Union

USDA-APHIS-PPQ Region	Participating Lumber Grading Agency	Lumber Grading Agency Contact
Eastern	Northeastern Lumber Manufacturer's Association, Inc. 272 Tuttle Road Cumberland Center, Maine 04021	Jeff Easterling Executive Vice President Phone: 207-829-6901 FAX: 207-829-4293
	Renewable Resource Associates, Inc. 3091 Chaparral Place Lithonia, Georgia 30038	Lon J. Sibert President Phone/FAX: 404-482-9385 James E. Loy
	Southern Pine Inspection Bureau 4709 Scenic Highway Pensacola, Florida 32504	Tom S. Jones President Phone: 850-434-2611 FAX: 850-433-5594
	Timber Products Inspection, Inc. P.O. Box 919 Conyers, Georgia 30012	Kris Coman Grover Lumber Division East Phone: 770-922-8000 x171 FAX: 770-922-1290
Western	California Lumber Inspection Service P.O. Box 6989 San Jose, California 95150	George Reinking Vice President & General Mgr. Phone: 408-993-1633 FAX: 408-246-5415
	California Redwood Association and Redwood Inspection Service 405 Enfrente Drive, #200 Novato, California 94949	Christopher Grover Executive Vice President Phone: 415-382-0662 FAX: 415-382-8531
	Pacific Lumber Inspection Bureau, Inc. P.O. Box 7235 Bellevue, Washington 98008	Jeff Fantozzi Secretary/General Manager Phone: 253-835-3344 FAX: 253-746-5522
	West Coast Lumber Inspection Bureau Box 23145 Portland, Oregon 97281-3145	Jim Neeber Executive Vice President Phone: 503-639-0651 FAX: 503-684-8928
	Western Wood Products Association 522 SW Fifth Avenue Portland, Oregon 97220	Jim Matthews Asst. Director of Quality Standards Phone: 503-224-3930 FAX: 503-224-3934
	Timber Products Inspection, Inc. 105 SE 124th Avenue Vancouver, Washington 98684	Casey Dean Lumber Inspector Phone: 360-449-3138 FAX: 360-449-3953

FIGURE 3-6-3: Lumber Grading Agencies Participating in Mill Certification Programs for Heat Treatment of Coniferous Sawn Wood Going to European Union Member States

Heat Treatment Certification Using a Kiln Facility

Lumber exported under a Mill Certification Program for heat treatment of coniferous sawn wood going to Member States of the European Union **must** be accompanied by a mill certificate, “Heat Treatment Certification Using a Kiln Facility.” The mill certificate attests that the wood has been properly heat treated.

Only sawn wood that has been kiln dried according to the provisions of the American Softwood Lumber Standard may be exported under this Mill Certification Program.

(See [Figure 3-6-4 on page 3-6-8](#) for an example of Heat Treatment Certification Using a Kiln Facility.)


 HEAT TREATMENT CERTIFICATION USING A KILN FACILITY		CERTIFICATE NUMBER	
<small>NAME AND ADDRESS OF SUPPLYING MILL (or as indicated in DESCRIPTION OF CONSIGNMENT)</small>		<small>NAME AND ADDRESS OF CONSIGNEE</small>	
<small>The lumber described below is certified to have undergone an appropriate heat treatment to achieve a minimum wood core temperature of 56 degrees C for 30 minutes.</small>			
<small>DESCRIPTION OF CONSIGNMENT</small>		<small>VOLUME</small>	
<small>INDICATE SPECIES, GRADE MARKS, OR OTHER IDENTIFYING MARKS. ALSO, INDICATE NUMBER OF PACKAGES AND BOARD FEET/CUBIC METERS BY LOT.</small>			
<small>This document is issued under a program officially approved by the Animal and Plant Health Inspection Service, U.S. Department of Agriculture. The products covered by this document are subject to preshipment inspection by that Agency. No financial liability shall be attached to the U.S. Department of Agriculture or to any officer or representative of the Department with respect to this certificate.</small>			
<small>AUTHORIZED PERSON RESPONSIBLE FOR CERTIFICATION</small>			
<small>NAME (Print)</small>	<small>SIGNATURE</small>	<small>TITLE</small>	<small>DATE</small>
<small>AGENCY VALIDATION</small>			
<small>SIGNATURE</small>		<small>TITLE</small>	<small>DATE</small>

FIGURE 3-6-4: Example of Heat Treatment Certification Using a Kiln Facility

Mill Certification Program Responsibilities

When an MOU establishes a Mill Certification for heat treatment of coniferous sawn wood going to Member States of the European Union, then the lumber grading agencies, the participating lumber mills, and the USDA-APHIS-PPQ regional offices each have stipulated responsibilities. These program responsibilities are listed below for the following:

- ◆ **Lumber Grading Agencies**
- ◆ **Lumber Mills**
- ◆ **USDA-APHIS-PPQ Regional Offices**

Lumber Grading Agencies

The responsibilities of lumber grading agencies, as stipulated in the MOUs, are as follows:

- ◆ Check monthly the quality control of the Mill Certification Program
- ◆ Maintain copies of issued certificates
- ◆ Maintain a list of designated personnel at each participating lumber mill who are approved to issue mill certificates
- ◆ Maintain signed agreements with participating lumber mills
- ◆ Provide training to mill inspectors of participating lumber mills
- ◆ Validate mill certificates issued by participating lumber mills

Lumber Mills

The responsibilities of participating lumber mills, as stipulated under the MOUs, are as follows:

- ◆ Designate personnel to issue mill certificates (Heat Treatment Certification Using a Kiln Facility)
- ◆ Send issued mill certificates to the lumber grading agency for final review and validation
- ◆ Treat all shipments of coniferous sawn wood moving under a Mill Certification Program according to the American Softwood Lumber Standard for heat treated or kiln dried wood

USDA-APHIS-PPQ Regional Offices

The responsibilities of the designated USDA-APHIS-PPQ regional offices are as follows:

- ◆ Designate personnel to conduct biannual audits and randomly inspect lumber grade agencies and their lumber mills participating in a Mill Certification Program
- ◆ Maintain in the regional office those MOUs for Mill Certification Programs established in the region

- ◆ Randomly inspect participating lumber mills and shipments of wood at points of export for conformance to the Mill Certification Program
- ◆ Randomly review the files and records of participating lumber grading agencies
- ◆ Conduct biannual audits of each lumber grading agency for which an MOU is signed and of their participating lumber mills (see also **Biannual Audit Checklist for Certification Programs** on page 3-6-23)
 - ❖ Meet with each lumber grade agency and participating lumber mills to review documentation
 - ❖ Check at participating lumber mills or at points of export that the shipments of coniferous sawn wood moving under a Mill Certification Program are meeting its conditions
 - ❖ Collect and submit to Export Services the results of the biannual audit by October 1 of each year (see **Figure 3-6-13 on page 3-6-24** for an example of a Biannual Audit Checklist for the Wood Mill Certification Programs)

Audit results are used to support Mill Certification Programs when foreign countries inquire about program validity

Kiln Dried Coniferous Sawn Wood Going to Non European Union Member States

Memorandums of Understanding (MOUs) and Mill Certification Programs established for kiln dried coniferous sawn wood going to non European Union Member States are similar to those previously mentioned (for coniferous sawn wood going to Member States of the European Union), yet are different in that they cover **only** kiln dried coniferous sawn wood.

Wood that has been heat treated or merely debarked is **not** authorized under these MOUs.

See **Figure 3-6-5 on page 3-6-11** for an example of an MOU for kiln dried coniferous sawn wood.

12-34-8x-xxx-MU
MEMORANDUM OF UNDERSTANDING
BETWEEN THE
[ASSOCIATION]
AND THE
UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE
PLANT PROTECTION AND QUARANTINE (APHIS)

ARTICLE 1

The Memorandum facilitates the implementation of an officially approved industry certification system to provide an alternative basis for the Federal phytosanitary certification of kiln dried coniferous sawn wood. This program does not apply to European Union (EU) member states.

ARTICLE 2

Authority exists under the Plant Protection Act of Section 431 (a), Public Law 106-224, for the Secretary of Agriculture to cooperate with the States of political subdivisions thereof, farmers' associations, and similar organizations, and individuals to detect, eradicate, suppress, control, or to prevent or retard the spread of plant pests and plant diseases, including the export certification of domestic plants and plant products.

ARTICLE 3

The cooperating parties agree that:

- a. The overall direction and control of this cooperative program is to be maintained by APHIS. Inspectional personnel shall remain administratively responsible to the Association.
- b. The basic control requirement for coniferous sawn wood under this system is kiln drying to the extent that all parts of the wood have reached a temperature of at least 160 degrees F (71 degrees C) and the moisture content of the wood has been reduced to less than 20 percent by weight.

ARTICLE 4

The Association agrees to/that:

- a. Kiln dried coniferous sawn wood shipments shall be inspected by an approved representative of the Association and, subject to the terms of Article 4.c, below, shall be certified as confirming to the certification statement imprinted on the **Mill Certificate of Kiln Drying**. A sample of this certificate is annexed to this document.
- b. Shipments of coniferous sawn wood moving into export channels that have been kiln dried according to the requirements of this system shall have bundles of coniferous wood in the shipment marked "KD" or "Kiln Dried" at the preparing mill.
- c. Maintain signed agreements with participating mills, a register of participating mills, including names and representatives approved to issue **Mill Certificates of Kiln Drying**, and copies of all certificates issued.
- d. Provide mill inspector training to all participating mills. Monthly review of the individual mill certification program shall be made through regular quality control checks by the Association.
- e. Make files and records available for review by APHIS in carrying out its responsibilities outlined in Article 5. Records will be retained for 3 years after the close of the Federal fiscal year.

ARTICLE 5

APHIS agrees to monitor the certification system for conformance by conducting random biannual inspections (minimally) at participating companies and at points of export and by reviews Lumber Grading Agency files and records.

FIGURE 3-6-5: Example of MOU for Kiln Dried Coniferous Sawn Wood (front)

ARTICLE 6

This Memorandum is to define in general terms, the basis on which the parties concerned will cooperate and, as such, does not constitute a financial obligation on the part of APHIS. Each signatory party is to use and manage its own funds in carrying out the purpose of this Memorandum.

ARTICLE 7

Pursuant to Section 22, Title 41, United States Code, no member or delegate to Congress shall be admitted to any share or part of this Memorandum or to any benefit to arise there from.

ARTICLE 8

This Memorandum shall become effective upon date of final signature and shall continue in effect for 5 years. It may be amended at any time by mutual agreement between the parties in writing and may be terminated by mutual agreement of the parties or by either party upon 30 days written notice to the other party.

ASSOCIATION

[LUMBER GRADING AGENCY NAME]

[NAME AND TITLE OF AGENCY REPRESENTATIVE]

[Signature] _____ Date _____

UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE
PLANT PROTECTION AND QUARANTINE

[Signature] _____ Date _____
Regional Director

FIGURE 3-6-6: Example of MOU for Kiln Dried Coniferous Sawn Wood (back)

Lumber Grading Agencies

USDA-APHIS-PPQ established MOUs with lumber grading agencies to facilitate the phytosanitary export certification of kiln dried coniferous sawn wood going to **non European** Union Member States. See [Figure 3-6-7 on page 3-6-13](#) for a list of participating lumber grading agencies.

Lumber Grading Agency	Lumber Grading Agency Contact
California Lumber Inspection Service PO Box 6989 San Jose, California 95150	George Reinking Vice President & General Mgr. Phone: 408-993-1633 FAX: 408-993-1642
California Redwood Association and Redwood Inspection Service 405 Enfrente Drive, No. 200 Novato, California 94949	Christopher Grover Executive Vice President Phone: 415-382-0662 FAX: 415-382-8531
Pacific Lumber Inspection Bureau Inc. P.O. Box 7235 Bellevue, Washington 98008	Jeff Fantozzi Secretary/Manager Phone: 253-835-3344 FAX: 253-746-5522
Timber Products Inspection, Inc. 105 SE 124th Avenue Vancouver, Washington 98684	Casey Dean Chief Lumber Inspector Phone: 360-449-3138 FAX: 360-449-3953
West Coast Lumber Inspection Bureau Box 23145 Portland, Oregon 97281-3145	Jim Neeber Executive Vice President Phone: 503-639-0651 FAX: 503-684-8928
Western Wood Products Association 522 SW Fifth Avenue Portland, OR 97220	Jim Matthews Assistant Director of Quality Standards Phone: 503-224-3930 FAX: 503-224-3934

FIGURE 3-6-7: Lumber Grading Agencies Participating in Mill Certification Programs for Kiln Drying of Coniferous Sawn Wood

Mill Certificate of Kiln Drying

All shipments of kiln dried coniferous sawn wood certified under these MOUs **must** have mill certificates that are validated by a participating lumber grading agency. The mill certificates **must** be presented to USDA-APHIS-PPQ for conversion to PPQ Form 577. (See [Figure 3-6-8 on page 3-6-14](#) for an example of a Mill Certificate of Kiln Drying.)

Special Procedures: Mill Certification Programs for Coniferous Sawn Wood
Kiln Dried Coniferous Sawn Wood Going to Non European Union Member States

MILL CERTIFICATE OF KILN DRYING		CERTIFICATE NUMBER
NAME AND ADDRESS OF SUPPLYING MILL		NAME AND ADDRESS OF CONSIGNEE
The lumber described below is certified to have been kiln dried to the extent that all parts of the wood have reached a temperature of at least 160 degrees F. (71 degrees C.) and the moisture content is less than 20 percent.		
DESCRIPTION OF CONSIGNMENT		VOLUME
INDICATE SPECIES, GRADE MARKS, OR OTHER IDENTIFYING MARKS. ALSO, INDICATE NUMBER OF PACKAGES AND BOARD FEET/CUBIC METERS BY LOT (<i>Lot number and volume are required</i>).		
<div style="display: flex; justify-content: space-between;"> <div> Mill Order No.: _____ Invoice No.: _____ Customer No.: _____ </div> <div> Number of Bundles.: _____ Marks on Bundles.: _____ Vessel.: _____ </div> </div>		
This document is issued under a program officially approved by the Animal and Plant Health Inspection Service, U.S. Department of Agriculture. The products covered by this document are subject to preshipment inspection by that Agency. No liability shall be attached to the U.S. Department of Agriculture or to any officer or representative of the Department with respect to this certificate.		
AUTHORIZED PERSON RESPONSIBLE FOR CERTIFICATION		
NAME(Print)	SIGNATURE	TITLE
DATE		
AGENCY VALIDATION		
AUTHORIZED SIGNATURE		TITLE
		DATE

FIGURE 3-6-8: Example of Mill Certificate of Kiln Drying

Mill Certification Program Responsibilities

When an MOU is entered into establishing a Mill Certification Program for kiln drying of coniferous sawn wood moving to non-European Member States, then the lumber grading agencies, the lumber mills, and USDA-APHIS-PPQ each have stipulated responsibilities. These program responsibilities are listed below for the following:

- ◆ **Lumber Grading Agencies**
- ◆ **Lumber Mills**
- ◆ **USDA-APHIS-PPQ Offices**
- ◆ **USDA-APHIS-PPQ Regional Offices**

Lumber Grading Agencies

The responsibilities of lumber grading agencies are essentially the same as those listed for coniferous sawn wood going to Member States of the European Union, **except** that lumber grading agencies return mill certificates to the lumber mill for conversion to Federal plant export certificates. The lumber grading agencies' responsibilities are as follows:

- ◆ Check monthly the quality control of the Mill Certification Program
- ◆ Maintain copies of issued certificates
- ◆ Maintain a list of designated personnel at each lumber mill who are approved to issue mill certificates
- ◆ Maintain signed agreements with participating lumber mills
- ◆ Provide training to mill inspectors of participating lumber mills
- ◆ Validate mill certificates issued by participating lumber mills
- ◆ Return to lumber mills the validated mill certificates for conversion to Federal plant export certificates by USDA-APHIS-PPQ

Lumber Mills

The responsibilities of participating lumber mills are as follows:

- ◆ Designate personnel to issue mill certificates
- ◆ Certify shipments using a Mill Certificate of Kiln Drying for kiln dried coniferous wood being exported to non European Union Member States
- ◆ Send issued mill certificates to the lumber grading agency for final review and validation
- ◆ Present validated mill certificates to USDA-APHIS-PPQ for conversion to Federal plant export certificates

USDA-APHIS-PPQ Offices

The responsibilities of USDA-APHIS-PPQ Port Offices are as follows:

- ◆ Review validated mill certificates
- ◆ Verify that lumber grading agencies are participating in Mill Certification Programs
- ◆ Issue Federal plant export certificates for those shipments of kiln dried coniferous sawn wood covered by properly validated mill certificates
- ◆ Retain copies of validated mill certificates as supporting documentation for issued Federal plant export certificates

USDA-APHIS-PPQ Regional Offices

The responsibilities of the designated USDA-APHIS-PPQ regional offices are as follows:

- ◆ Designate personnel to conduct biannual audits and randomly inspect lumber grade agencies and their lumber mills participating in a Mill Certification Program
- ◆ Maintain in the regional office those MOUs for Mill Certification Programs established in the region
- ◆ Randomly inspect participating lumber mills and shipments of wood at points of export for conformance to the Mill Certification Program
- ◆ Randomly review the files and records of participating lumber grading agencies
- ◆ Conduct biannual audits of each lumber grading agency for which an MOU is signed and their participating lumber mills (see also **Biannual Audit Checklist for Certification Programs** on page 3-6-23)
 - ❖ Meet with each lumber grading agency and participating lumber mills to review documentation
 - ❖ Check at participating lumber mills or at points of export that the shipments of coniferous sawn wood moving under a Mill Certificate Program are meeting its conditions
 - ❖ Collect and submit to Export Services the results of the biannual audit by October 1 of each year (see **Figure 3-6-13 on page 3-6-24** for an example of a Biannual Audit Checklist for the Wood Mill Certification Programs)

Audit results are used to support Mill Certification Programs when foreign countries inquire about program validity.

Debarking and Grub Hole Control of Coniferous Sawn Wood

The Mill Certification Program for debarking and grub control of coniferous sawn wood allows for certifying air dried coniferous sawn wood or kiln dried sawn wood of *Thuja* spp. going to Member States of the European Union.

**XX-MU
MEMORANDUM OF UNDERSTANDING
BETWEEN THE
[ASSOCIATION]
AND THE
UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE
PLANT PROTECTION AND QUARANTINE (APHIS)**

Relative to

**Preparation and Certification of Coniferous Sawn Wood of Thuja spp. Intended for Export
to the European Member States**

ARTICLE 1

The object of this Memorandum is to facilitate the implementation of an officially approved industry certification system to satisfy provisions of the national legislation of Member States of the European Union (EU) derived from Plant Health Directive 77/93/EEC, as amended, with respect to freedom from bark and grub holes on coniferous sawn wood originating in the United States. This program is applicable to Member States of the EU and to coniferous lumber pertaining to Thuja spp. only.

ARTICLE 2

This Memorandum is entered into by the Service by virtue of authority included in the Plant Protection Act of, Section 431 (a), Public Law 106-224, to cooperate with the States of political subdivision thereof, farmers' associations, and similar organizations, and individuals to detect, eradicate, suppress, control, or to prevent or retard the spread of plant pests and plant diseases, including the export certification of domestic plants and plant products.

ARTICLE 3

The cooperating parties agree that:

- a. The overall direction and control of this cooperative program is to be maintained by the Service. Inspectional personnel shall remain administratively responsible to the Association.
- b. The basic control requirement for coniferous sawn wood (Thuja spp. only), including spacers or other attached dunnage, is freedom from bark and grub holes larger than 3mm across associated with shipments, but the following conditions, if existing, shall not disqualify a shipment from certification:

1. Waney edges from which external bark has otherwise been totally removed
2. Ingrown bark, in particular, around knots
3. Bark/pitch pockets, as described in the National Grading Rules
4. Holes caused by Teredo worms (marine mollusks)
- 5.

ARTICLE 4

The Association agrees:

- a. That unseasoned or air-dried coniferous sawn wood shipments, if not otherwise covered by a phytosanitary certificate, shall be inspected by an approved representative of the Association and, subject to the terms of Article 4.c, below, shall be certified as meeting the wood control requirements of the importing country. A sample of a **Mill Certificate of Debarking and Grub Hole Control** is annexed into this document.
- b. To maintain signed agreements with participating mills, and a registry of participating mills including names of representatives approved to issue certificates of debarking and grub hole control and copies of all certificates issued.

FIGURE 3-6-9: Example of MOU for Debarking and Grub Control of Coniferous Sawn Wood (front)

c. To provide mill inspector training to all participating mills. Monthly review of the individual mill certification program shall be made through regular quality control checks by the Association.

ARTICLE 5

The Service agrees:

a. To conduct an orientation program for designated mill inspectors on the plant health requirements of receiving countries pertaining to coniferous wood.

b. To monitor the certification system for conformance via random biannual inspection at participating mills, points of export, and reviews of Association files and records.

ARTICLE 6

This Memorandum is to define in general terms, the basis on which the parties concerned will cooperate and, as such, does not constitute a financial obligation to serve as a basis for expenditures. No transfer of Federal funds shall be involved under this Memorandum.

ARTICLE 7

This Memorandum shall become effective upon date of final signature and shall continue in effect for 5 years. It may be amended at any time by mutual agreement between the parties in writing and may be terminated by mutual agreement of the parties or by either party upon 30 days written notice to the other party.

ASSOCIATION

[LUMBER GRADING AGENCY NAME]

[NAME AND TITLE OF AGENCY REPRESENTATIVE]

[Signature] _____ Date _____

UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE
PLANT PROTECTION AND QUARANTINE

[Signature] _____ Date _____
Regional Director

FIGURE 3-6-10: Example of MOU for Debarking and Grub Control of Coniferous Sawn Wood (back)

Lumber Grading Agencies

See [Figure 3-6-11](#) for a list of lumber grading agencies participating in the Mill Certification Program for debarking and grub control of coniferous sawn wood. These lumber grading agencies may certify air dried coniferous sawn wood or kiln dried sawn wood of *Thuja* spp.

Lumber Grading Agency	Lumber Grading Agency Contact
California Lumber Inspection Service P.O. Box 6989 San Jose, California 95150	George Reinking Vice President & General Manager Phone: 408-993-1633 FAX: 408-993-1642
California Redwood Association and Redwood Inspection Service 405 Enfrente Drive, #200 Novato, California 94949	Christopher Grover Executive Vice President Phone: 415-382-0662 FAX: 415-382-8531
Pacific Lumber Inspection Bureau Inc. P.O. Box 7235 Bellevue, Washington 98008	Jeff Fantozi Secretary/Manager Phone: 206-747-6542 FAX: 206-746-5522
West Coast Lumber Inspection Bureau Box 23145 Portland, Oregon 97281-3145	Jim Neeber Executive Vice President Phone: 503-639-0651 FAX: 503-684-8928
Western Wood Products Association 522 SW Fifth Avenue Portland, Oregon 97220	Jim Matthews Assistant Director of Quality Standards Phone: 503-224-3930 FAX: 503-224-3934
Timber Products Inspection, Inc. P.O. Box 20455 Portland, Oregon 97220	Casey Dean Chief Lumber Inspector Phone: 503-254-0204 FAX: 503-252-9267

FIGURE 3-6-11: List of Lumber Grading Agencies Participating in Mill Certification Programs for Kiln Drying, Debarking, and Grub Hole Control

Certificate of Debarking and Grub Hole Control

This Mill Certification Program allows for the certification of debarking and grub hole control for coniferous sawn wood of **only** *Thuja* spp. going to Member States of the European Union. Air dried coniferous sawn wood **must** have mill certification that the wood is free from bark and grub holes larger than 3 millimeters in diameter. The mill certificates **must** be presented to USDA-APHIS-PPQ for conversion to PPQ Form 577. (See [Figure 3-6-12 on page 3-6-21](#) for an example of the Certificate for Debarking and Grub Hole Control.)

Special Procedures: Mill Certification Programs for Coniferous Sawn Wood
Debarking and Grub Hole Control of Coniferous Sawn Wood

CERTIFICATE OF DEBARKING AND GRUB HOLE CONTROL Issued in the U.S.A.		CERTIFICATE NUMBER <hr/> BILL OF LADING NUMBER		
NAME AND ADDRESS OF SUPPLYING MILL	NAME AND ADDRESS OF CONSIGNEE <i>(Optional)</i>			
DESCRIPTION OF CONSIGNMENT <small>INDICATE SPECIES, GRADE MARKS, OR OTHER IDENTIFYING MARKS. ALSO, INDICATE NUMBER OF PACKAGES AND BOARD FEET/CUBIC METERS BY LOT (Lot number and volume are required).</small>		VOLUME		
<p><i>The lumber in this shipment has been examined by a mill inspector or other authorized person and found to have been stripped of its bark and to be free of grub holes; and, to the best of his/her knowledge and belief, to be in conformance with the import requirements of the receiving country.</i></p> <p>-----</p> <p><i>This document is issued under a program officially approved by the Animal and Plant Health Inspection Service, U.S. Department of Agriculture. The products covered by this document are subject to preshipment inspection by that Agency. No liability shall be attached to the U.S. Department of Agriculture or to any officer or representative of the Department with respect to this certificate.</i></p>				
AUTHORIZED PERSON RESPONSIBLE FOR CERTIFICATION				
NAME (Print)	SIGNATURE	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">TITLE</td> <td style="width: 50%;">DATE</td> </tr> </table>	TITLE	DATE
TITLE	DATE			
AGENCY VALIDATION				
AUTHORIZED SIGNATURE		<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">TITLE</td> <td style="width: 50%;">DATE</td> </tr> </table>	TITLE	DATE
TITLE	DATE			

FIGURE 3-6-12: Example of Certificate of Debarking and Grub Hole Control

Mill Certification Program Responsibilities

When an MOU is entered into to establish a Mill Certification Program for debarking and grub hole control of *Thuja* spp. going to Member States of the European Union, then the lumber grading agency, the participating lumber mills, and the USDA-APHIS-PPQ offices each have stipulated responsibilities. These program responsibilities are listed below for the following:

- ◆ **Lumber Grading Agencies**
- ◆ **Lumber Mills**
- ◆ **USDA-APHIS-PPQ Port Offices**
- ◆ **USDA-APHIS-PPQ Regional Offices**

Lumber Grading Agencies

The responsibilities of lumber grading agencies are as follows:

- ◆ Check monthly the quality control of the Mill Certification Program
- ◆ Maintain copies of issued certificates
- ◆ Maintain a list of designated personnel at each participating lumber mill who are approved to issue mill certificates
- ◆ Maintain signed agreements with participating lumber mills
- ◆ Provide training to mill inspectors of participating lumber mills
- ◆ Validate mill certificates issued by participating lumber mills

Lumber Mills

The responsibilities of participating lumber mills are as follows:

- ◆ Designate personnel to issue mill certificates
- ◆ Certify unseasoned or air-dried coniferous sawn wood as meeting the requirements of the foreign country using a Certificate of Debarking and Grub Hole Control
- ◆ Send issued mill certificates to the lumber grading agency for final review and validation
- ◆ Inspect unseasoned or air-dried coniferous sawn wood

USDA-APHIS-PPQ Port Offices

The responsibilities of USDA-APHIS-PPQ offices are as follows:

- ◆ Review the validated mill certificates presented by the lumber mills
- ◆ Verify that lumber grading agencies are participating in Mill Certification Programs
- ◆ Issue Federal plant export certificates for those shipments of kiln dried coniferous sawn wood covered by properly validated mill certificates

**USDA-APHIS-PPQ
Regional Offices**

- ◆ Retain copies of validated mill certificates as supporting documentation for issued Federal plant export certificates

The responsibilities of the designated USDA-APHIS-PPQ regional offices are as follows:

- ◆ Designate personnel to conduct biannual audits and randomly inspect lumber grade agencies and their lumber mills participating in a Mill Certification Program
- ◆ Maintain in the regional office those MOUs for Mill Certification Programs established in the region
- ◆ Randomly inspect participating lumber mills and shipments of wood at points of export for conformance to the Mill Certification Program
- ◆ Randomly review the files and records of participating lumber grading agencies
- ◆ Conduct biannual audits of each lumber grading agency for which an MOU is signed and of their participating lumber mills (see also **Biannual Audit Checklist for Certification Programs** on page 3-6-23) as follows:
 - ❖ Meet with each lumber grade agency and participating lumber mills to review documentation
 - ❖ Check at participating lumber mills or at points of export that the shipments of coniferous sawn wood moving under a Mill Certificate Program are meeting its conditions
 - ❖ Collect and submit to Export Services the results of the biannual audit by October 1 of each year (see **Figure 3-6-13 on page 3-6-24** for an example of a Biannual Audit Checklist for the Wood Mill Certification Programs)

Audit results are used to support Mill Certification Programs when foreign countries inquire about program validity

Biannual Audit Checklist for Certification Programs

How to conduct the biannual audits and work with the checklist. [To be provided by Export Services during final review.] (See **Figure 3-6-13 on page 3-6-24** for an example of a Biannual Audit Checklist for Mill Certification Programs.)

BIANNUAL AUDIT CHECKLIST FOR THE WOOD MILL CERTIFICATION PROGRAMS

DATE OF AUDIT: _____

AGENCY or MILL AUDITED/address:

CONTACT PERSON/ phone number:

MOU(s) Audited	(check)
Coniferous Sawn Wood for Heat Treatment Moving to European Union (EU)	<input type="checkbox"/>
Kiln Drying MOU	<input type="checkbox"/>
Debarking, and Grub Hole Control of Thuja sp to European Union (EU)	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>

AUDIT RESULTS:

	Yes	No	N/A
Agency maintains the signed agreements (MOU's) with the participating mills:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Agency maintains a list of participating mills and their representatives that are approved to issue mill certificates:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Maintains copies of all certificates issued:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Training provided to mill inspectors:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Agency maintains a list of Lumber Grading Agency employees eligible to validate mill certificates:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Agency completes monthly review of the Certification Programs:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Milled products shipped meet conditions of the programs:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

COMMENTS: _____

AUDITOR's SIGNATURE: _____ DATE: _____

PRINT NAME: _____ OFFICE: _____

FIGURE 3-6-13: Example of Biannual Audit Checklist for Mill Certification Programs